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18
19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN JOSE DIVISION**

22 TCGIVEGA INFORMATION
23 TECHNOLOGIES PVT. LTD.,

24 Plaintiff,

25 v.

26 KARNA GLOBAL TECHNOLOGIES, INC.;
27 KANNAN R. AYYAR; JNANA R. DASH
28 AKA JNAN DASH; AND GREGORY D.
HAWKINS,

Defendants.

CASE NO. CV-05-05222 JF (HRL)

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND ALL PENDING
DEADLINES AND TO CONTINUE
PENDING HEARING DATE**

29 The parties, by and through their respective counsel, hereby agree and stipulate, and jointly
30 request that the Court enter this stipulation as an Order of the Court, as follows:

STIPULATION

31 1. The parties have been engaged in serious settlement discussions since August 1,
32 2007 and seek a brief stay on all activity in this matter to avoid the expense and inconvenience of

conducting litigation activities while those discussions continue.

2. In light of these discussions, the parties recently filed a Stipulation to Extend Time to Respond to Counterclaim and Stipulation and Order to Continue Hearing on Plaintiff's Motion for a Protective Order, entered on August 16, 2007, which moved the response date for Defendants' counterclaim to September 10, 2007 and moved the hearing date on Plaintiff's pending motion for protective order regarding the deposition of Purnendu Chatterjee to September 11, 2007.

3. There have been four (4) previous extensions of the pre-trial deadlines: (1) Stipulation and Order re: Non-Expert Discovery, disclosure of Expert Witness, Expert Discovery and Hearing on Dispositive Motions, entered on November 29, 2006; (2) Stipulation and Order Extending Pre-Trial Deadlines, entered on February 5, 2007; (3) Stipulation and Order Further Extending Certain Pre-Trial Deadlines; and (4) Order Re: Defendants Karna Global Technologies, Inc., Kannan R. Ayyar, Jnana R. Dash and Gregory D. Hawkins' Motion to Extend This Court's Scheduling Order, entered on August 2, 2007.

4. The last of these extensions of the pre-trial resulted in the following pre-trial schedule for this matter:

- a. Discovery cut-off: October 2, 2007.
- b. Disclosure of expert witnesses: October 2, 2007.
- c. Completion of expert discovery: October 23, 2007.
- d. Last day for hearing of dispositive motions: November 27, 2007.

5. In light of the pending settlement discussions, the parties wish to extend all pending dates and deadlines for approximately thirty (30) days as follows:

- a. Plaintiff to respond to Defendants' counterclaim: October 10, 2007.
- b. Hearing date on Plaintiff's pending motion for protective order: October 11, 2007, thereby making Plaintiff's reply papers due on September 27, 2007.
- c. Discovery cut-off: November 2, 2007.
- d. Disclosure of expert witnesses: November 2, 2007.
- e. Completion of expert discovery: November 30, 2007.

f. Last day for hearing of dispositive motions: December 28, 2007.

6. The parties submit that good cause exists for the foregoing requested extensions given the progress that has been made toward settlement

IT IS SO STIPULATED.

Dated: August 24, 2007

THE CHUGH FIRM, APC

By: /s/ Antoinette McGill
Antoinette McGill, Esq.

Attorneys for Defendants
JNANA R. DASH, GREGORY D. HAWKINS,
KARNA GLOBAL TECHNOLOGIES, INC., and
KANNAN R. AYYAR

Dated: August 24, 2007

BERGESON, LLP

By: /s/ Michael W. Stebbins
Michael W. Stebbins, Esq.

Attorneys for Plaintiff
TCGIVEGA INFORMATION TECHNOLOGIES
PVT. LTD.

I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/s/) within this efiled document.

ORDER

In accordance with the foregoing stipulation of the parties, and with good cause appearing therefor, the Court enters the Stipulation as an Order of the Court.

IT IS SO ORDERED.

Dated: 9/4/07, 2007


UNITED STATES DISTRICT COURT JUDGE
JEREMY FOGEL

f. Last day for hearing of dispositive motions: December 28, 2007.

6. The parties submit that good cause exists for the foregoing requested extensions given the progress that has been made toward settlement

IT IS SO STIPULATED.

Dated: August __, 2007

THE CHUGH FIRM, APC

By: 

Antoinette McGill, Esq.

Attorneys for Defendants
JNANA R. DASH, GREGORY D. HAWKINS,
KARNA GLOBAL TECHNOLOGIES, INC., and
KANNAN R. AYYAR

Dated: August 27, 2007

BERGESON, LLP

By: 

Michael W. Stebbins, Esq.

Attorneys for Plaintiff
TCGIVEGA INFORMATION TECHNOLOGIES
PVT. LTD.

I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/s/) within this efiled document.

ORDER

In accordance with the foregoing stipulation of the parties, and with good cause appearing therefor, the Court enters the Stipulation as an Order of the Court.

IT IS SO ORDERED.

Dated: _____, 2007

UNITED STATES DISTRICT COURT JUDGE